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Before the
Federal Communications Commission
Washington D.C. 20554

In the matter of
Proposal for the Creation of the Low Power FM
(LPFM) Broadcast Service

FCC RM-9242
Comments of Randy Wells

Briefly, allow me to say that I am in favor of the adoption of FCC RM-9242 as proposed by Mr. J. Rodger Skinner.

I have been an avid radio listener and critic over the last 40-odd years. It has been my chosen passion for 30, and profession for the last 25. In that span of time, I have seen a shift in the focus, and a resulting erosion of quality, diversity, and service to the Public.

Several years ago, all of the stations in a market were owned by different entities; some large corporations, some small corporations, and some "Mom and Pop" operations. The larger corporate-owned stations broadcast a large corporate sound; very slick, polished and, unfortunately, devoid of any local flavor. They "played the hits", or had an hour-long "News and Weather Together" news presentation. Just what you would expect from the "big-city" stations.

In any given town, we could always rely on the 1000-watter on the outskirts of the city to broadcast the voice of OUR town. Admittedly sophomoric at times, we could still hear the local "Swap Shop", the latest fender-bender, (complete with names and addresses!), the local high-school sportscast, and even the listing of who's in the local hospital, and might use some cheering-up, that day. This is real radio; people relating to people.

Over the years, the stations' value went up, the Telcom Bill allowed multiple-station ownership, and the value escalated to astronomical proportions. The debt service on today's radio stations is so tremendous, that any sort of creativity or experimentation is foolhardy. The Bankers would pull the plug!

If the market in which I live is typical, we have eleven slightly different flavors of "Classic Rock", two bids to secure the "County" fans' vote, three soft-rock knock-offs, and thankfully an NPR affiliate, and an AM Newstalker. Not one of them will air your "lost-dog" report. Unfortunately, these stations are all chasing

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the Almighty Arbitron; prompting the Management to sacrifice diversity in favor of the lowest common denominator. Seen any good ratings-driven television, lately?

The various would-be Broadcasters, or "Pirates" in town have taken-up the slack, with a Modern Jazz outlet, a vintage Swing outlet, a free-form young-adult Reggae, Heavy-metal and Techno station, and finally, a facility that re-broadcasts the satellite-delivered American Freedom Network. The Marketplace has spoken!

If local neighborhood radio were to, in fact, become a reality, the Micro broadcasters would be able to support their own efforts by selling commercials. The real benefit would be that the frequencies used would be researched, rather than arbitrary, and the type-accepted equipment would not prompt airplanes to fall from the sky.

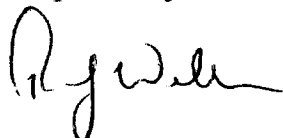
A couple of points, if you please...

(1) If the proposal were to be adopted, IT IS IMPERATIVE that all "profit-potential" be removed from the acquisition and selling of an LPFM. We want to keep the financial speculators out, this time. If the "trustee" is chooses to "sell" the station, he should be entitled to recoup only his actual costs. No "appreciation" allowed.

(2) I have a problem with "multiple-ownership". We don't need any more "corporations"; LPFM or otherwise. If these allocations have no takers in a given town, don't award them until there is an interested party with no other facilities. We're trying to make each station as individual and local as possible. We don't need satellite-fed LPFMs.

Thank you for your consideration of this Petition, and for allowing comments.

Respectfully submitted,



Randy Wells
April 26, 1998